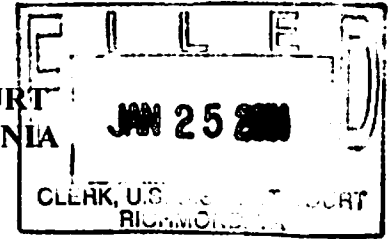


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



KYSS BURTON, by her mother, SAKIA HALL)
as next friend,)

and)

SAKIA HALL,)

Plaintiffs,)

v.)

HAROLD FORD,)

Defendant.)

Civil Action No. 3:11CV065

NOTICE OF REMOVAL

HAROLD FORD ("Officer Ford"), pursuant to 28 U.S.C. § 1446, notes the removal of the action filed against him by Plaintiffs Kyss Burton and Sakia Hall.

1. On or about August 26, 2010, Plaintiffs filed a Complaint against him in the Circuit Court for the City of Richmond, Case No. CL10-3675. A copy of the Complaint is attached as Exhibit A. A copy of Officer Ford's Answer is attached as Exhibit B.

2. In the Complaint, Plaintiffs allege that Officer Ford deprived Kyss Burton of her constitutional rights in excessive force, falsely arresting and imprisoning her in violation of state laws and section 42 U.S.C. 1983. *See* Complaint ¶¶13-33. Pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441 this case may be removed to this Court. Whenever a separate cause of action within the jurisdiction conferred by Section 1331 is joined with an otherwise non-removable claim the entire case may be removed.

3. Venue lies in this Court because Plaintiffs' action is pending in this District and Division. 28 U.S.C. § 1441(a).

4. Notice has been given this day to the Circuit Court for the City of Richmond that this Notice of Removal has been filed. Attachment B.

WHEREFORE, defendant Officer Harold Ford notes his removal of this case from the Circuit Court for the City of Richmond to the United States District Court for the Eastern District of Virginia, Richmond Division.

Respectfully Submitted,

HAROLD FORD

By Counsel



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Counsel for the Defendant Harold Ford

CERTIFICATE OF SERVICE

I, Brian K. Telfair, hereby certify that on the 28th day of January, 2011, a true copy of the foregoing Notice of Removal was mailed first-class, postage pre-paid, to:

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